

Stratton, J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CORNWALL MANAGEMENT LTD and OLEG  
SOLOVIEV a/k/a OLEG VALENTINOVICH  
SOLOVIEV

Plaintiffs,  
v.

THOR UNITED CORP. a/k/a THOR UNITED  
CORPORATION, JOHN DOE THOR ENTITIES,  
ATLANT CAPITAL HOLDINGS, LLC, OLEG  
BATRACHENKO a/k/a OLEG  
BATRATCHENKO a/k/a O.V.  
BATRACHENKOV, PETER KAMBOLIN  
NORTH 3RD DEVELOPMENT, LLC and  
ABRAHAM BENNUN,

Defendants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 4-2-2013

Civil Action No. 12-cv-08551 (LLS)

**STIPULATION AND  
[PROPOSED] ORDER**

WHEREAS, Cornwall Management Ltd and Oleg Soloviev a/k/a Oleg Valentinovich Soloviev ("Plaintiffs") filed their Complaint on November 21, 2012;

WHEREAS, Plaintiffs filed an Amended Complaint on February 26, 2013;

WHEREAS, defendants, Peter Kambolin and Atlant Capital Holdings, LLC ("Defendants") time to answer, move or otherwise respond to the Amended Complaint is currently set for April 3, 2013;

WHEREAS, Defendants request an extension of time to answer, move or otherwise respond to the Amended Complaint;

WHEREAS, Plaintiffs consent to the Defendants' request; and

WHEREAS, Defendants have made no prior requests for an extension of time:

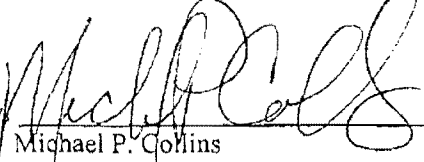
IT IS HEREBY STIPULATED, by and between the undersigned counsel for Plaintiffs and Defendants, without waiving any rights, defenses, or arguments they may assert, except as set forth below, and subject to the approval of the Court, as follows:

1. The Defendants' time to answer, move or otherwise respond to the Amended Complaint shall be extended to and including April 26, 2013; and

2. The Defendants shall waive all defenses related to personal jurisdiction, venue, and service of process.

DATED: March 29, 2013

BOND SCHOENEK & KING PLLC

By: 

Michael P. Collins  
collinm@bsk.com  
330 Madison Avenue, 29<sup>th</sup> Floor  
New York, New York 10017  
(646) 253-2318

*Attorneys for Plaintiffs*

TANNENBAUM HELPERN SYRACUSE  
& HIRSCHTRITT LLP

By: 

Paul D. Sarkozi  
sarkozi@thsh.com  
Zev F. Raben  
raben@thsh.com  
900 Third Avenue  
New York, New York 10022  
(212) 508-6700

*Attorneys for Defendants  
Peter Kambolin and  
Atlant Capital Holdings, LLC*

SO ORDERED:

  
Hon. Louis L. Stanton, United States District Judge 

4/2/13